

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
(Newark Vicinage)

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

Civil No. 2:19-md-02904-MCA-MAH

Judge Madeline Cox Arleo

This Document Relates To:
Case No. 2:24-cv-00569-MCA-MAH,
Bratten v. Quest Diagnostics et al.,
Quest/Optum Track

Magistrate Judge Michael A. Hammer

**DECLARATION OF CARL STEVENS IN SUPPORT OF MOTION TO
DISMISS OR, IN THE ALTERNATIVE,
MOTION FOR SUMMARY JUDGMENT**

I, Carl Stevens, declare and state under penalty of perjury as follows:

1. My name is Carl Stevens. I am over the age of 18 and am competent to make this declaration. I am employed as Director of Privacy at Optum, Inc. The facts set forth herein are based upon my personal knowledge and upon my review of business records of Optum360, LLC ("Optum360"). If called as a witness to testify regarding these facts, I could and would do so competently.

2. On May 14, 2019, Retrieval-Masters Creditors Bureau, Inc.'s (d/b/a American Medical Collection Agency) ("AMCA") provided written notice to Optum360, LLC ("Optum360") of the AMCA data breach.

3. AMCA represented to Optum360 that it sent notification letters to certain Quest individuals whose information was potentially involved in the AMCA data breach.

4. In June 2019, AMCA provided Optum360 with the data that AMCA used for notification purposes (the "AMCA Notification Data"). The AMCA Notification Data includes the names and addresses of potentially impacted individuals. For each individual, the AMCA Notification Data includes a Y/N designation indicating whether AMCA sent the individual notice of the AMCA data breach.

5. I have reviewed the Excel file Bates labeled OPTUM360_AMCA_0049863 ("Excel x863").

6. Excel x863 is one of the files comprising the AMCA Notification Data.

7. Gregory Bratten is identified in Row 572107 of Excel x863. The "Y" in the "noticed" column indicates that AMCA notified Gregory Bratten of the AMCA data breach.

8. Exhibit A is a true and correct excerpt of Row 572107 from Excel x863, along with the corresponding column headers for reference.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: May 23, 2024



Carl Stevens